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12 Attorneys for
13 GOOGLE LLC

14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**

16 **SAN FRANCISCO**

17 ANIBAL RODRIGUEZ, *et al.* individually and
18 on behalf of all other similarly situated,

19 Plaintiffs,
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21 vs
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23 GOOGLE LLC, *et al.*
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25 Defendant.
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Case No. 3:20-CV-04688

29 **[PROPOSED] ORDER RE:
30 SUPPLEMENTAL BRIEF RE:
31 PLAINTIFFS' REQUEST FOR GOOGLE
32 TO EMPLOY ADDITIONAL SEARCH
33 TERMS**

34 Judge: Hon. Alex G. Tse
35 Courtroom: A, 15th Floor
36 Action Filed: July 14, 2020
37 Trial Date: Not Set

[PROPOSED] ORDER

Before the Court is Google’s Supplemental Letter Brief regarding Plaintiffs’ request that Google employ Terms 40 and 43 identified in the January 20, 2022 Order, Dkt. No. 208 (“Supplemental Search Term Letter Brief”).

Having considered the Supplemental Search Term Letter Brief, the Court orders that Google should search the below terms as indicated with an “X” in the column labeled “Google to Search”:

No.	Search Terms	Google to Search:
Custodian: Francis Ma¹		
40b-1	(FCM or “cloud messaging”) AND (Gold OR analytics OR GA4F OR scion OR ((app or apps or application or applications) /5 (event OR interact* OR activity OR measure*)) OR appmeasurement OR WAA* or sWAA OR “my account” or “my activity” OR conversion* OR AdMob OR “Google mobile service” OR GMS OR Clearcut OR “Google Mobile Platform” OR GMP)	X
40b-2	(FCM or “cloud messaging”) /15 firebase	
40b-3	(FCM or “cloud messaging”) /15 perform*	
40b-4	(FCM or “cloud messaging”) /15 event	
40b-5	(FCM or “cloud messaging”) /15 audience	
Custodian: Todd Hansen		
40c-1	(FCM or “cloud messaging”) /10 (Gold OR analytics OR GA4F OR scion OR ((app OR apps OR application OR applications) /5 (event OR interact* OR activity OR measure*)) OR appmeasurement OR “my account” or “my activity” OR conversion* OR AdMob OR “Google mobile service” OR GMS OR Clearcut OR “Google Mobile Platform” OR GMP)	X
40c-2	(FCM or “cloud messaging”) /5 firebase	
40c-3	(FCM or “cloud messaging”) /10 perform*	
40c-4	(FCM or “cloud messaging”) /10 event	
40c-5	(FCM or “cloud messaging”) /10 audience	

¹ Each search term under an identified custodians' name should be employed for that custodian.

No.	Search Terms	Google to Search:
Custodian: Steve Ganem		
43b-1	(Analytics OR GA4F OR Scion OR “Google Mobile Platform” OR GMP) AND (((app OR apps OR application OR applications) /5 (event OR interact* OR activity OR measure*)) OR WAA* OR sWAA OR “my account” OR “my activity” OR AdMob OR FCM OR “Cloud Messaging” OR appmeasurement)	X
43b-2	Firebase /15 (((app or apps or application or applications) /5 (event OR interact* OR activity OR measure*)) OR WAA* or sWAA OR “my account” OR “my activity” OR perform* OR conversion* OR event OR audience OR AdMob OR FCM OR “Cloud Messaging” OR appmeasurement OR “Google mobile service” OR GMS OR Clearcut)	
43b-3	(Analytics OR GA4F OR Scion OR “Google Mobile Platform” OR GMP) /5 conversion*	X
43b-4	(Analytics OR GA4F OR Scion OR “Google Mobile Platform” OR GMP) /15 conversion*	
43b-5	(Analytics OR GA4F OR Scion OR “Google Mobile Platform” OR GMP) /15 perform*	
43b-6	(Analytics OR GA4F OR Scion OR “Google Mobile Platform” OR GMP) /15 event	
43b-7	(Analytics OR GA4F OR Scion OR “Google Mobile Platform” OR GMP) /15 audience	
43b-8	(Analytics OR GA4F OR Scion OR “Google Mobile Platform” OR GMP) /15 (“Google mobile service” OR GMS OR Clearcut)	
43b-9	Gold /15 (((app or apps or application or applications) /5 (event OR interact* OR activity OR measure*)) OR WAA* or sWAA OR “my account” or “my activity” OR AdMob OR FCM OR “Cloud Messaging” OR appmeasurement)	X
43b-10	Gold /5 conversion	X
43b-11	Gold /15 (perform* OR event OR audience OR “Google Mobile Service” OR GMS OR Clearcut)	
Custodian: Monsees, Ma, Hansen, Weng		
43c-1	(“Google Mobile Service” OR GMS OR Clearcut) /10 (Gold OR analytics OR GA4F OR scion OR “Google Mobile Platform” OR GMP OR ((app or apps or application or applications) /5 (event OR interact* OR activity OR measure*)) OR appmeasurement OR WAA* or sWAA OR “my account” OR “my activity” OR conversion* OR FCM OR “cloud messaging” OR AdMob)	X
43c-2	(“Google Mobile Service” OR GMS OR Clearcut) /10 firebase	
43c-3	(“Google Mobile Service” OR GMS OR Clearcut) /10 perform*	
43c-4	(“Google Mobile Service” OR GMS OR Clearcut) /10 event	

No.	Search Terms	Google to Search:
43c-5	(“Google Mobile Service” OR GMS OR Clearcut) /10 audience	

4 **IT IS SO ORDERED.**

5 DATED: _____

6
7 Honorable Alex G. Tse
8 United States Magistrate Judge

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